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Teresita Salire
US Army Corp of Engineers
Targeted Brownfields Assessment, Project Manger
333 Market Street
San Francisco, CA 94105

Dear Teresita:

This letter outlines Weston Solutions, Inc (WESTON) responses to comments from the US Environmental Protection Agency (USEPA), the US Army Corp of Engineers (USACE), and City of Corona Redevelopment Agency regarding the Combined Targeted Brownfields Assessment, Phase I/II Investigation, Draft Final Report, dated March 2007. The appropriate agency comments and concerns are presented in bold, followed by WESTON responses. The submission of the Draft Final Report and appendices are attached.

US Army Corp of Engineers - Teresita Salire:

General Comment:

- 1) **7.1 Summary of Findings and Conclusion. TPH-oil and diesel levels are elevated on parcel 107-070-046, which may warrant a closer look at the PAHs. PAHs levels are non-detect, however the detection limits for some PAHs are above the action levels. Suggest to state that this should not be a concern because eventually, remediation of the TPH-contaminated soil will take care of the PAH also.**

Comment noted. Section 7.1 was modified to discuss raised detection limits for PAHs and note that remediation of TPH as motor oil contaminated soil will remove PAHS to set action levels.

2) **7.4 Recommendation**

- 1) **Explain that the levels of TPH-oil and diesel may warrant further characterization of the extent of contamination.**
- 2) **Explain your recommendation on how the data gaps stated in Section 7.2 can be addressed by the City.**

Comment noted. Section 7.4 was modified to explain that further characterization of TPH as diesel and motor oil contaminated soil may be required to determine the extent of TPH as diesel and motor oil on APN 107-070-046.

The data gap originally described in the Draft Final Report was addressed by contacting Keith Person of the Santa Ana RWQCB. Keith explained that the non-inert waste disposal was concrete washout and was disposed off the Site. However, Mr. Person also stated there were concerns that TPH contaminated soil may have been disposed of on the Site. These concerns were never confirmed. Section 7.4 now discusses the new data gap. It is noted in the section that biased samples have been collected at APNs 107-070-037, 107-070-047, and 107-070-048 and analyzed for TPH. However, further characterization based on concerns of potential dumping of TPH contaminated soil may be required.

City of Corona – Darla Charbonnet:

- 1) **Section 1.1 Page 7 - In the last paragraph, it is the Redevelopment Agency of the City of Corona who will be subleasing the Site in order to relocate various businesses, not the City of Corona. Please revise.**

In that same paragraph, second to the last sentence, revise the City of Corona to “Agency”.

Comment noted. The City of Corona Redevelopment Agency is now listed as the potential sub letter of the Hohn property.

- 2) **Section 1.2 Page 8 - In the first paragraph, same comment as above.**

Comment noted. “Redevelopment Agency” has been added into the paragraph.

- 1) **Section 1.4 Page 8 – Please revise the sentence to indicate Bruce Hohn manages the property for the Hohn Family Trust.**

Comment noted. Section 1.4 now states that Bruce manages the property for the Hohn Family Trust, II AVMGH.

- 4) **Section 1.4 Page 9 - At the top of page 9, the last sentence should be revised to state “sampling of soil at biased locations”.**

Comment noted. The correction was made.

5) Section 2.1 Page 10 - APN 107-070-016 is missing from the list.

Comment noted. APN 107-070-016 was added to the list and the number of parcels changed from six to seven. APN 107-070-016 was added into other areas of the document as appropriate.

6) Section 2.2.3 Page 12 - In the last paragraph of this section, second to last line, it states that there is no groundwater wells located on the site. This contradicts a statement on page 15 that indicates there are wells located on APN 107-070-019 and 107-070-048. Please reconcile.

Comment noted. There are three groundwater wells on the Site. The statement in Section 2.2.3 that there are no groundwater wells on the Site was removed.

7) Section 2.3 page 12 - See comment 5 above regarding the APN. In the same paragraph, the correct name for All American Asphalt.

Section 2.3 Page 13 – See comment 5 above.

Section 2.3 Page 15 – See comment 6 above.

Section 2.3 Page 15 – in the last paragraph of this section it states the City of Corona is the owner of APN 107-070-030. Our records indicated II AVMGH as the owner.

Section 2.3 Page 15 under APN 107-070-047, the last statement indicates there are no plans to remove the piles left on this parcel. In order for the Agency to relocate users to the site, the piles will be removed.

Section 2.3 Page 16 under APN 107-070-046, in the first sentence delete the second word “is” after currently.

Comment noted. APN 107-070-016 was added into the appropriate parts of Section 2.3. American Asphalt was changed to All American Asphalt.

Information obtained from Craig Hoffman, consultant for the City of Modesto Redevelopment Agency, shows that APN 107-070-030 is owned by the County of Riverside Flood Control District. The report now states that APN 107-070-030 is owned by the County of Riverside Flood Control District.

Per site interview with Bruce Hohn, it is the responsibility of the City of Corona Redevelopment Agency to modify the Site after leasing it. The report now states that the piles will be removed before the Site is sublet by the City of Corona Redevelopment Agency.

The word “is” was deleted.

8) Section 2.5 Page 20 – See comment 7 above.

Comment noted. American Asphalt was changed to All American Asphalt.

9) Section 3.3 Page 21 – in the first paragraph, first sentence delete the word “tank” after diesel.

Comment noted. The word “tank” was deleted.

10) Section 3.5 Page 22 – Please reword the second and third sentence, they are unclear.

Comment noted. The second, third, and fourth sentences were reworded to provide clarity: Three groundwater wells were observed on the Site. The field crew observed several pipes leading from various pads at the site that appear to lead from wells on site. Bruce Hohn confirmed the existence of the three groundwater wells and stated that the wells provide industrial water for various activities at the site, including dust control.

11) Section 3.10 Page 22 – The section on Radon gas appears to be out of place and a portion of a previous document prepared. There are not living areas located on this site.

The information provided in Section 3.10 was obtained from page 87 of Appendix C, the EDR Radius Map report for the City of Corona site. The data is taken in the zone that the Site lies in, and not specifically at the Site. This information is a required part of the Phase I/II TBSA.

12) Page 29 – See comment number 1.

Comment noted. The City of Corona Redevelopment Agency is now listed as the potential sub letter of the Site.

City of Corona – Craig Hoffman:

- 1) **Section 1.1 Scope of Work and Purpose (pg 7 and throughout document) – reference is made to the “City of Corona site (Site) in Corona”; since the City refers to the project site as the “Hohn Project”, changing this reference might simplify references to the referenced property for the reader of this and subsequent documents.**

Comment noted. As the previously submitted Sampling Analysis Plan names the site the “City of Corona” site, WESTON feels it is appropriate to continue referring to the site as the “City of Corona” site for continuity.

- 2) **Section 1.1 Scope of Work and Purpose (pg 7, last paragraph and throughout document) – references to “City of Corona” as the project proponent should be revised to the “City of Corona Redevelopment Agency”.**

Comment noted. The City of Corona Redevelopment Agency is now listed as the potential sub letter of the Hohn property throughout the document

- 3) **Section 1.4 Limiting Conditions and Methodology Used (pg 8, last paragraph) – Bruce Hohn is the manager for the Hohn Family Trust.**

Comment noted. Section 1.4 now states that Bruce manages the property for the Hohn Family Trust, II AVMGH.

4. **Section 1.4 Limiting Conditions and Methodology Used (pg 9, last sentence of last paragraph) - . . . the testing and sampling soil ~~of~~ at biased . . . delete the word “of”**

Comment noted. The word “of” was deleted.

- 5) **Section 2.1 Site Location (pg 10 and throughout document) – The Hohn Project site includes sections of six parcels and one parcel owned by the County of Riverside Flood Control District (see attached Constraints Exhibit).**

Comment noted. The County of Riverside Flood Control District is now listed as the owner APN 107-070-030. The report has been modified to state that the Site consists of a total of seven parcels.

- 6) **Section 2.2.3 Hydrology (pg 12, last paragraph) – Reference to no groundwater wells contradicts descriptions on pages 15 and 22. Please revise to be consistent throughout document.**

Comment noted. There are three groundwater wells on the Site. The statement in Section 2.2.3 that there are no groundwater wells on the Site was removed.

- 7) **Section 2.3 Site Description and Current Use (pg 12 and throughout document) – reference is made to adjacent manufacturing businesses surrounding the site; the proper name for “American Asphalt” is “All American Asphalt”.**

Comment noted. American Asphalt is now referred to as All American Asphalt throughout the document.

- 8) **Section 2.3 Site Description and Current Use (pg 13) - this entire paragraph is awkward and should be restated.**

Comment noted. The paragraph was reworded and now reads: The Site lies immediately adjacent to Lake Hohn, which is a pit lake associated with quarrying activities at the site. As shown in Figure 2-2, the areas of the parcels 107-070-016, 107-070-019, 107-070-037, 107-070-046, 107-070-047, 107-070-048 that are occupied by Lake Hohn and to the east of Lake Hohn are not part of the Site. The Site layout is presented in Figure 2-2.

- 9) **Section 2.3 Site Description and Current Use (pg 15, second paragraph) – regarding the groundwater well, contradicts the statement on pg 12.**

Comment noted. The statement in Section 2.2.3 that there are no groundwater wells on the Site was removed so that there are no contradictions concerning groundwater wells.

- 10) **Section 2.3 Site Description and Current Use (pg 15, third paragraph) – Flood Control Channel is owned by the County of Riverside Flood Control District (see attached Constraints Exhibit).**

Comment noted. The County of Riverside Flood Control District is now listed as the owner APN 107-070-030.

- 11) **11. Section 2.3 Site Description and Current Use (pg 15, re: APN 107-070-047) – modify text:
Manhole Builders currently operates at-on the APN 107-070-047 parcel . . .
. . . were not accessed by anyone during the site inspection and TBSA Phase II sampling event and ~~there are no plans to remove the piles.~~ will be removed to facilitate future development on the property.**

Comment noted. The sentence in the first paragraph now reads: Manhole Builders currently operates on APN 107-070-047.

The last paragraph was modified to read: The piles were not accessed by anyone during the site inspection and TBSA Phase II sampling event. In the event that the

City of Corona Redevelopment Agency leases the Site. The City of Corona Redevelopment Agency will remove the piles before subletting the property

- 12) **Section 2.3 Site Description and Current Use (pg 16) – modify text:**
... Corona Truck Salvage business which ~~is~~ currently is no longer ...
... being used to store trucks and bulldozers ~~underneath~~ as observed during the site ...

Comment noted. The appropriate sentences were modified.

- 13) **Section 2.4.4 Previous Environmental Investigations (pg 19) – Regarding reference to permits issued for B.P. John Recycling activities on the site – City staff has indicated a past history of code enforcement issues related to the operation of recycling activities on the property. Please confirm the accuracy of these statements.**

Comment noted. An interview with Keith Person of the Santa Ana Regional Water Quality Control Board has taken place after the Draft Report was submitted. Section 2.4.4 now confirms that B. P. John Recycling, Inc. code enforcement issues did not result in citations for B. P. John Recycling, Inc..

- 14) **Section 2.5 Current and Past Uses of Adjoining Properties (pg 20, second paragraph) – The reference to the removal of 1 million cubic yards of waste should be clarified. The applicant (Bruce Hohn) has represented that the Grading Plans currently being processed for approval by the City includes approximately 250,000 cubic yards of material to be disposed of on the adjacent property.**

Comment noted. Per the phone discussion with Craig Hoffman on March 29, 2007, the number of cubic yards will be changed from 1 million to 255,300.

- 15) **3.3 Aboveground and Underground Storage Tanks (pg 21) – modify text: There is one 500-gallon above ground diesel storage tank ~~above ground storage tank~~ (AST) located ...**

Comment noted. This sentence has been modified per Darla Charbonnets comments to read: There is one 500-gallon diesel above ground storage tank (AST) located on the Site at APN 107-070-046.

16. **3.5 Water Supply (pg 22) – Reference to three wells contradicts statement on page 12. Please revise.**

Comment noted. Page 12 has been modified so that there are no longer contradictions between the statements.

17. 3.5 Water Supply (pg 22) modify text:
... observed several pipes leading from various pads ~~that~~at the site that appear to lead from ~~the~~ wells on site. . . .
18. 6.1.3 Volatile Organic Compounds Results (pg 33) – modify text:
...the soil samples analyzed for VOCs. Benzene was detected in ~~one~~one sample at a . . .

Comment noted. The modifications listed above have been made.